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3 District of Nevada  
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10 *Attorneys for the United States*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 Hernando Alberto Heredia,

14 Plaintiff,

15 v.

16 United States of America *ex rel.* United  
17 States Postal Service,

18 Defendants.

19 Case No. 2:22-cv-01846-RFB-DJA

20 **Stipulation to Extend Joint Pretrial  
Order Deadline**

21 **(Second Request)**

22 Pursuant to Fed. R. Civ. P. 6(b)(1)(B), as well as LR IA 6-1, LR 26-3, Plaintiff  
23 Hernando Alberto Heredia (“Plaintiff”) and Defendant United States of America (“United  
24 States”), on behalf of the United States Postal Service (“USPS”), by and through their  
undersigned counsel, hereby request the Court extend the deadline to file a proposed joint  
pretrial order by 60 days from January 24, 2025 to **March 24, 2025**. The current deadline  
to file a joint pretrial order is January 24, 2025. ECF No. 32. On January 23, 2025,  
Plaintiff’s counsel reached out to the undersigned regarding participating in a settlement  
conference before a magistrate judge to try to resolve this case prior to filing a joint pre-trial  
and starting trial preparation. Although the undersigned is not opposed to a settlement  
conference in this case, the undersigned informed counsel that she needs to communicate  
counsel’s request for a settlement conference to the United States Postal Service.  
Considering both counsel workload schedules and the parties attempt to get this case  
resolved prior to trial, the parties respectfully request the Court grant their stipulation to

1 extend the joint pretrial order deadline to **March 24, 2025**. The parties will submit a  
2 separate stipulation and order for a settlement conference before a magistrate judge. If this  
3 case does not settle, the parties agree to provide a joint pretrial order within 14 days of the  
4 conclusion of the settlement conference. This is the second request to extend the deadline  
5 to file a proposed joint pretrial order. This request for an extension is made in good faith  
6 and not for the purpose of causing undue delay and prejudice.

7 Respectfully submitted this 23rd day of January 2025.

8  
9 SUE FAHAM  
10 Acting United States Attorney

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12 HICKS & BRASIER, PLL  
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16 /s/ Virginia T. Tomova  
17 VIRGINIA T. TOMOVA  
18 Assistant United States Attorney  
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20 /s/ Betsy C. Jefferis-Aguilar  
21 BETSY C. JEFFERIS-AGUILAR  
22 Attorney for Plaintiff  
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24 IT IS SO ORDERED:  
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26 RICHARD F. BOULWARE, II  
27 UNITED STATES DISTRICT JUDGE  
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29 DATED: January 24, 2025  
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